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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,)	CASE NO. CR 19-100 VC
)	
14 Plaintiff,)	DECLARATION OF SAN FRANCISCO POLICE
)	DEPARTMENT SERGEANT ALICIA
15 v.)	WORTHINGTON
)	
16 RAMON COFIELD,)	
)	
17 Defendant.)	
)	

18
19 I, Alicia Worthington (née Castillo), declare and state as follows:

20 1. I am currently employed as a police officer with the San Francisco Police Department
21 ("SFPD"), a position that I have held since 2002. I was promoted to Inspector in October of 2010 and
22 Sergeant in March of 2012. From 2010, I worked within several investigative units at SFPD district
23 stations including the Mission, Tenderloin, and Park stations until November of 2017. Throughout my
24 entire career, I have investigated and /or have been involved in the investigations of hundreds of cases
25 that fall within the spectrum of incident types investigated by the Special Victims Unit (i.e. Domestic
26 Violence, Child Abuse, Sexual Assault, Missing Persons, ICAC, Sex Offender (compliance), Stalking,
27 Human Trafficking, Financial Crimes, etc.)

28 2. Effective November 4, 2017, I was transferred to the Internet Crimes Against Children

1 (“ICAC”) Unit within the Special Victims Unit (“SVU”). My primary responsibilities included
 2 investigations into allegations of child physical and sexual abuse transmitted over the internet, through
 3 cellular networks, and through various applications (i.e. chatting and social media apps). In addition to
 4 formal training at the San Francisco Police Academy, I have completed the following training, relevant
 5 to Special Victims Unit investigations:

- 6 a. Robert Presley Institute of Criminal Investigation (ICI) Course (POST)
- 7 b. Child Abuse – ICI Course (POST)
- 8 c. Freenet Network Investigations (USDOJ)
- 9 d. ADF Digital Evidence Investigator Training
- 10 e. Search Warrant and Arrest Course (POST)
- 11 f. Reid Technique of Interviewing and Interrogation (DEA)
- 12 g. Online Protections for Children and Families When Social Distancing (NCJTC)
- 13 h. Child Sex Trafficking From Suspicion to Disclosure (NCJTC)

14 3. On November 30, 2017—a few weeks after I was assigned to ICAC—I was assigned
 15 SFPD Case # 170-965-489, CyberTip #25390444. The CyberTip reflected that Tumblr had reported an
 16 image to the National Center for Missing and Exploited Children (NCMEC).

17 4. It should be noted that I did not direct Tumblr to search for this image, nor was I aware of
 18 the image prior to receiving the NCMEC CyberTip. Stated differently, I had no involvement with
 19 Tumblr or NCMEC’s investigation until I received the CyberTip. To the best of my knowledge, no
 20 SFPD officer instructed Tumblr to search for the specific image that led to the CyberTip in this case.

21 5. Upon receiving the NCMEC CyberTip, I reviewed it and noted the following facts,
 22 among others:

- 23 a. The Tip had been created on November 8, 2017 and the “Incident Type” was listed as
 24 “Child Pornography (possession, manufacture, and distribution)”;
- 25 b. The CyberTip included the Tumblr user’s email address (rxxcofield@gmail.com),
 26 screen/user name (chaz2076), and IP address (162.238.124.187);
- 27 c. The suspect’s last login appeared to be on March 31, 2014; and
- 28 d. Tumblr had terminated the blog so that it could no longer be accessed.

1 6. Because I was not familiar with Tumblr prior to receiving the CyberTip, I then
2 researched Tumblr, and learned that it was a microblogging website that allowed users to post
3 multimedia and other content on to their blogs. I learned that users could follow each other's blogs, and
4 that bloggers could make their blogs private.

5 7. The CyberTip did not provide information regarding the identity of the user. Thus, my
6 top priority was identifying who may have posted the child pornography image to this Tumblr account.
7 I began investigating by using the information available to me from the CyberTip.

8 8. Because the CyberTip included the user's Gmail address and Tumblr username, I drafted
9 and submitted search warrants to search both the Google and Tumblr accounts for various information,
10 including account information, subscriber names, user names, images, links, and videos. I submitted the
11 search warrants on December 11, 2017—less than two weeks after I initially received the CyberTip.

12 9. When I submitted my affidavits for the Google and Tumblr search warrants, the
13 information I had learned in my investigation thus far was largely limited to the information contained in
14 the CyberTip and what I learned when I researched Tumblr. After including my background and
15 general information about Tumblr, I wrote:

16 Tumblr reported the following:

17 On 11/08/17 at 21:12:00 UTC a Tumblr with the user name **chaz2076** with the IP
18 Address of **162.238.124.187** utilizing the email of rxxcofieldgmail.com uploaded
19 the filename: **78180748604.jpg** to their Tumblr blog address of
20 **chaz2076.tumblr.com** in early part of 2014, beginning in February.

21 In this paragraph, I intended to summarize the key information gleaned from the CyberTip that was
22 created on November 8, 2017. Specifically, I intended to convey that a Tumblr user with the username
23 chaz2076 used an email address as a means to establish the account, either by login or username, namely
24 rxxcofield@gmail.com. In my experience, a person's email address could be a useful avenue in leading
25 to the identity of the individual using the social media account. I later learned that both the Tumblr
26 username and Gmail account were Ramon Cofield's. I did not intend to indicate that the user had used
27 the Gmail account to actually upload the image in that instance.

28 I also intended to convey that the user had uploaded the specific image (78180748604.jpg) in the
early part of 2014, beginning in February. This referenced the fact that the CyberTip included several

1 pages of posts from February to March 2014, including this specific image. I also described the image
2 in my affidavit, to demonstrate why I believed it constituted a violation of California Penal Code §
3 311.11(a), possession of child pornography.

4 10. After describing the image, I then wrote the following:

5 I conducted an online search for **chaz2076.tumblr.com** and discovered several
6 archived images of nude underage teenage males exposing their genitals that
7 appeared to have been uploaded to Tumblr by **chaz2076** to another Tumblr user's
8 blog in 2014.

9 This paragraph reflects the results of my online search near the time that I submitted the affidavits (i.e.,
10 late 2017), which indicated that there were several explicit images of underage individuals that appeared
11 to have been cached on the internet, thus available and publically accessible and associated with Ramon
12 Cofield's Tumblr username.

13 This paragraph also reflects my assumption at the time that, like other social media platforms
14 with which I was more familiar, a Tumblr user could upload images to another Tumblr user's blog. I
15 believed this because I was unfamiliar with Tumblr prior to receiving the CyberTip in this case and
16 because the image said "via chaz2076," which to me indicated that "chaz2076" had posted the image to
17 the other user's blog him or herself. I've attached a sanitized example to the end of my declaration for
18 the Court's review. I used the language "appeared to have been" due to my uncertainty on how exactly
19 the technology functioned. I now understand that a Tumblr user cannot upload or post an image on to
20 another user's blog. Instead, what I now understand is that a Tumblr user can repost an image that was
21 previously on another Tumblr user's blog. To use the sanitized example at the end of my declaration for
22 reference, this would mean that Tumblr user "petizoreil" (noted at the bottom of the page) reposted the
23 image from chaz2076's account. The basic concept that I intended to convey remained the same—the
24 images I described in my affidavit were associated with the Tumblr account associated with Ramon
25 Cofield at some point in time. I believe this was significant for the probable cause analysis because it
26 demonstrated multiple pornographic images of underage individuals were associated with Cofield's
27 Tumblr account.

28 11. With respect to the Google warrant, I was familiar with Google and its products when I
sought the search warrant. Based on my knowledge of Google's products, I sought a search warrant for

1 the specific Google products that I believed could be used to store photographs or indications of who
2 used the Google account.

3 12. I included all of the information in the Google and Tumblr search warrants that I believed
4 in good faith to be relevant to the Magistrate Judge's probable cause determination. I did not
5 intentionally avoid including any facts.

6 13. I received the Google search warrant returns first, on December 18, 2017. The returns
7 revealed, among other information, a phone number associated with the Gmail account ("subject phone
8 number"), numerous photographs of underage male and females exposing their genitalia (some of the
9 boys had erect penises), and several photographs in subfolders titled "Saturday" and "Profile Photos" of
10 an unknown male I believed could be the subscriber to the Gmail account (later determined to be
11 Cofield). The returns also included chats from Google Hangouts, Google's communication platform,
12 which included a chat conversation between Cofield and a self-identified 14-year-old individual
13 engaging in sexually explicit conversation. I then conducted a records check for the subject phone
14 number and found that it was associated with a Facebook page
15 <https://www.facebook.com/ramon.cofield>. Photos on this Facebook page further matched the Google
16 photographs in the above mentioned subfolders. At this point, I felt relatively certain that a Ramon
17 Cofield was the person operating the Tumblr blog with the username "chaz2076" and that he possessed
18 child pornography.

19 14. Another SFPD officer then conducted a criminal background check for Ramon Cofield,
20 and found that he was (and still is) a convicted sex offender based on a prior conviction in the Northern
21 District of California for possession of child pornography. At this point, I positively identified Cofield
22 through a comparison of the photos of him contained in his Google and Facebook accounts against one
23 of his SF mugshots.

24 15. On December 21, 2017, ten days after receiving Google returns, I sought and obtained a
25 search warrant for AT&T Wireless that requested "[a]ll account information, email addresses,
26 passwords, subscriber information, and methods of payment associated with" the subject phone number.

27 16. The next day (December 22, 2017), AT&T provided the requested subscriber information
28 including an account number, which indicated that the account holder's name was Ramon Cofield, that

1 his address was located between Ninth and Mission Streets in San Francisco, and that his account status
2 was active. I confirmed the provided address was also the one listed as Cofield's address in the state sex
3 offender registry.

4 17. I received the Tumblr search warrant returns more than three (3) months later, on
5 February 28, 2018. I reviewed the results and discovered over 1,000 images of child pornography.
6 Some of the images reflected underage teens, both males and females, engaged in sex acts with adults
7 and each other.

8 18. After I received the returns from the Google, Tumblr, and AT&T warrants, I included all
9 the relevant information I received in my affidavit seeking a search warrant for Cofield's residence. A
10 state magistrate judge issued a search warrant for Cofield's residence on May 1, 2018. The warrant
11 allowed SFPD to search Cofield's person and residence for a number of items that might relate to
12 storing child pornography, including "[a]ny cloud storage applications found on any media device."

13 19. On May 3, 2018, I and other SFPD officers executed the search on Cofield's residence.
14 Cofield was home and detained without incident. During the search of Cofield's residence, SFPD
15 seized:

- 16 a. a laptop computer;
- 17 b. six cellular phones;
- 18 c. two DVDs;
- 19 d. a piece of paper listing a Tumblr account, the email address rxxcofield@gmail.com, and
20 what appeared to be passwords; and
- 21 e. letters addressed to Cofield as indicia of his occupancy.

22 Subsequent searches of the devices found in his residence revealed hundreds of images of child
23 pornography.

24 20. After executing the residential search warrant, Cofield was detained and transported to
25 the Special Victims Unit at 850 Bryant Street, Room 500. After I gave him his *Miranda* warnings, I and
26 another SFPD officer interviewed him. During this interview, Cofield admitted to a number of these
27 summarized facts:

- 28 a. Cofield confirmed one of his cell phone numbers to be the subject phone number;

- b. Cofield admitted to liking younger males;
- c. Cofield stated “Chaz” was a nickname he obtained while attending Georgetown University;
- d. Cofield confirmed one of his email’s to be rxxcofield@gmail.com;
- e. Cofield admitted to using Tumblr;
- f. Cofield admitted to possessing photos of underage children he pulled off of Tumblr (between the ages of 13-17 years old); and
- g. Cofield admitted that he has a lot of pictures that he has saved off Tumblr.

21. If I was not able to proceed in my investigation as outlined above, I would have continued to exhaust every avenue available to me to identify the person using the Tumblr account (chaz2076) where the child pornography image was found. For example, from the CyberTip, I had access to the IP address and the Gmail address (rxxcofield@gmail.com), either of which I believe could have led me to identify Ramon Cofield. In my experience, email addresses are frequently associated with a phone number or other identifying personal information, such as a person’s name or even their address. Therefore, even if my search warrant to Google was limited to seeking only Google user identity information, the Google returns would likely have included the subject phone number. As I did in this case, I would have then conducted an Accurint search, identified AT&T as the provider, and sought the search warrant to AT&T for subscriber information. That, in turn, would have revealed Cofield’s name and address.

22. Alternatively, the CyberTip provided the IP address associated with the Tumblr account and listed AT&T as the service provider. Thus, even if I did not obtain the Google and Tumblr search warrants, I would have sought a search warrant for AT&T to determine any identifying information, such as name, phone number, and address, associated with the relevant IP address. Once AT&T responded with the above-described subscriber information, that would have led me down the same investigative path and I would have eventually determined Cofield’s identity and sought the residential search warrant as I did in this case.

23. Furthermore, regardless of the returns of the Google search warrant, once the Tumblr returns came back and indicated that Cofield had over 1,000 child pornography images associated with

1 his account, I would have sought the residential search warrant based on those facts, alone, as soon as I
2 identified the person associated with the Tumblr username chaz2076.

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7 I declare under penalty of perjury that the foregoing is true and correct to the best of my
8 knowledge.

9 Executed this 23rd day of December 2020 in Marin County, California

10
11 /s/ Alicia Worthington (electronically signed by AUSA with permission from Sgt. Worthington)
12 ALICIA WORTHINGTON, #1999
13 Officer, San Francisco Police Department
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Example Post

